

**REMARKS****Status of the claims**

Claims 1-10 are pending in the application, with claim 5 being allowable. No claims have been amended.

**Rejections under 35 U.S.C. §103**

1) Claims 1-4, 6 and 10 remain rejected under 35 USC §103 as being obvious over Sugimoto et al. (USP 4,620,772). Applicants traverse this rejection and withdrawal thereof is respectfully requested. In response to Applicants' remarks of April 11, 2005, the Examiner asserts the following.

Applicants argued that the Examiner failed to provide proper motivation for a *prima facie* obviousness rejection because proper motivation for combining the references was not established. In response to this argument, the Examiner states that motivation to provide different characteristics like chemical resistance or optical transparency was provided on page 3 of the first office action and that "one of ordinary skill in the art is concerned with chemical resistance of the sides of the polarizer because the polarizers are used in contact with liquid crystals...and therefore one would want to protect each side of the film from the specific liquid crystal it is placed against." Applicants would like to clarify the asserted lack of motivation. While Applicants do not dispute the Examiner's assertion that one skilled in the art would be concerned with chemical resistance, the present invention specifically requires that the first protective film and second protective film be different from each other in at least one of thickness, physical properties and materials. The Examiner has failed to provide motivation for why one skilled in the art would differ the films on each surface of the polarized film from each other. While Sugimoto et al. may teach that one skilled in the art is concerned with chemical resistance, the reference does not suggest that protective films should be placed on each side of a polarized film that are different from each other. As such, a *prima facie* obviousness rejection has not been properly supported.

The Examiner further asserts, in response to Applicants' argument that the expansion coefficient of Sugimoto et al. is for a cell substrate, that column 1, lines 55-58 of Sugimoto et al. combined with column 3, lines 50-51 indicate that the cell substrate of Sugimoto et al. is, in fact, a protective film adhered to a polarizer, thus forming a polarizing plate. Thus, the expansion coefficients of these cell substrates meet the limitations of MI and M2 as claimed. However, the Examiner has misinterpreted the description of the expansion coefficients of Sugimoto et al.

Applicants agree that Sugimoto et al. describe at column 1, lines 55-58, that a cell substrate is formed by stretching a film on both sides of a polarizer. However, column 3, line 67, through column 4, line 49, describe the measurement of the coefficient of expansion and it is seen from a reading of this section that the coefficient of expansion of Sugimoto et al. is between two cell substrates, not between the films on either side of a single cell substrate.

Column 3, line 67, through column 4, line 49, states that "In the present invention, two types of polarizing plates are formed." Column 4, lines 3-8, describes the construction of the first polarizing plate and column 4, lines 9-32, describe the construction of the second, "other", type of polarizing plate. Column 4, lines 33-49 then states,

The thus-produced two cell substrates are assembled such that the electrode patterns of the substrates are positioned exactly in a face-to-face relation, and the periphery of the assemble is sealed. Simultaneously with this sealing, a liquid crystal is introduced between the cell substrates to obtain a liquid crystal display plastic cell. In assembling the cell substrates in accordance with the present invention, it is necessary that they be disposed in such a manner that the stretching axes of the monoaxially stretched films are in parallel with each other.

More preferably, a difference in moisture-absorbing expansion coefficient between the two cell substrates is from 0.00 to 0.15%, preferably from 0.00 to 0.01%, in the stretching axis of the monoaxially stretched film (MD), and 0.15% or less, preferably 0.05% or less, in a direction perpendicular to the stretching axis (TD). (*emphasis added*)

Thus, it is evident from a consideration of the full text of Sugimoto et al. that the reference, as explicitly stated, measures the moisture absorbent coefficient between two cells substrates, not

between the films on either side of a single polarizer. This is clearly different from the recited feature of claim 1 that the protective films on either side of the same polarizing film satisfy the relationship that the coefficients of expansion M1, M2 satisfy a formula;  $0.65 \cdot M1 < M2 < 1.55 \cdot M1$ . As such, Sugimoto et al. fails to teach or suggest the claimed features of the present invention and withdrawal of the rejection is respectfully requested.

2) Claims 7-9 remain rejected as being obvious over Sugimoto et al. combined with Sata et al. (JP 2002071955A). JP '955 is relied on for teaching the use cellulose acylate for making protective films to provide high durability. Applicants traverse this rejection and withdrawal thereof is respectfully requested. JP '955 fails to teach the information lacking from Sugimoto et al., as such, for the reasons discussed above, there is no motivation to modify Sugimoto et al. and the present invention is not achieved even if the combined teachings of the references are considered. Withdrawal of the rejection is respectfully requested.

As the above Remarks address and overcome the rejections asserted by the Examiner, withdrawal of the rejections and allowance of the claims are respectfully requested. If the Examiner has any questions regarding the present application he is requested to contact MaryAnne Armstrong, PhD (Reg. No. 40,069) in the Washington DC area, at (703) 205-8000.

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Respectfully submitted,

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